

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,	Adv. Pro. No. 08-01789 (CGM)
Plaintiff-Applicant,	SIPA Liquidation
v.	(Substantively Consolidated)
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	
Defendant.	
In re:	
BERNARD L. MADOFF,	
Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,	Adv. Pro. No. 20-01316 (CGM)
Plaintiff,	
v.	
RAFAEL MAYER, DAVID MAYER, MONTELLIER INTERNATIONAL LTD., PRINCE ASSETS LTD. (f/k/a PRINCE ASSETS LDC), KHRONOS GROUP LTD. (f/k/a MONTELLIER RESOURCES LTD.), PRINCE RESOURCES LDC, MONTELLIER USA HOLDINGS LLC, PRINCE CAPITAL PARTNERS LLC, and KHRONOS LIQUID OPPORTUNITIES FUND LTD.	
Defendants.	

STIPULATION AND ORDER

Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-III (“SIPA”), substantively consolidated with the chapter 7 estate of Bernard L. Madoff, and Defendants Rafael Mayer, David Mayer, Prince Resources LDC, Prince Capital Partners

LLC and Khronos Liquid Opportunities Fund Ltd. (collectively, the “Defendants”) (together with the Trustee, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, the parties stipulated to a briefing schedule in this adversary proceeding, and the Court adopted the schedule in the Stipulation and Order dated January 22, 2021 (ECF No. 5);

WHEREAS, on March 2, 2021, Defendants filed motions to dismiss the Trustee’s complaint in this adversary proceeding (ECF Nos. 17, 21, 24 and 25) (the “Motions”) in accordance with the Stipulation and Order; and

WHEREAS, on March 4, 2021, the Court set a hearing date on the Motions for June 16, 2021 at 10:00 a.m. (ECF No. 30);

WHEREAS, on May 4, 2021, the Trustee filed oppositions to the Motions (ECF Nos. 41, 42 and 44) in accordance with the Stipulation and Order;

WHEREAS, the Parties have agreed to adjourn the hearing date and extend the remaining reply date because the Trustee’s counsel has a scheduling conflict with the June 16 hearing date;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. The deadline for Defendants to file their reply papers is adjourned from June 1, 2021 to June 15, 2021; and
2. The hearing date for the Motions is adjourned from June 16, 2021 to July 28, 2021 at 10:00 a.m.

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Dated: May 25, 2021
New York, New York

/s/ Jason S. Oliver

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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the chapter 7 estate of
Bernard L. Madoff*

Dated: May 25, 2021
New York, New York

/s/ Daniel H. Tabak

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Dated: May 25, 2021
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Dated: May 25, 2021
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/s/ Carlos J. Canino

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Dated: May 25, 2021
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*Attorneys for Khronos Liquid Opportunities
Fund Ltd.*

SO ORDERED.

**Dated: May 25, 2021
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge**